

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

**COMMSCOPE HOLDING COMPANY, INC.,
COMMSCOPE INC., ARRIS
INTERNATIONAL LIMITED, ARRIS
GLOBAL LTD., ARRIS US HOLDINGS, INC.,
ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC,**

Defendants.

CIV. A. NO. 2:21-CV-310-JRG
(Lead Case)

TQ DELTA, LLC,

Plaintiff,

v.

**NOKIA CORP., NOKIA SOLUTIONS AND
NETWORKS OY, and NOKIA OF AMERICA
CORP.,**

Defendants.

CIV. A. NO. 2:21-CV-309-JRG
(Member Case)

DECLARATION OF M. SCOTT STEVENS

I declare under penalty of perjury that the foregoing is true and correct.

I, M. Scott Stevens, hereby declare under penalty of perjury that:

1. I am an attorney at the law firm of Alston & Bird LLP and counsel for Defendants Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of America Corporation. I am a member in good standing of the North Carolina Bar and am admitted to practice before this Court. Except where otherwise indicated, I have personal knowledge of the facts stated herein and, if called as a witness, I could and would testify thereto.

2. On Friday, July 8th, counsel for Nokia and TQ Delta met and conferred regarding the topics discussed in the present motion. On that date, Nokia offered to provide a stipulation that Nokia's products have enjoyed commercial success outside the United States. Nokia also offered to produce composite sales information reflecting its worldwide sales. TQ Delta rejected Nokia's offer (although indicated a desire to continue to discuss) and instead moved forward with filing the present motion.

3. After additional email correspondence on the subject again offering to provide composite sales information, on Monday, July 25th, counsel for Nokia and TQ Delta again met and conferred regarding the topics discussed in the present motion. Nokia further offered to provide total annual, worldwide sales information for the accused products, identified in Nokia's response to TQ Delta's Interrogatory No. 1, in this case. TQ Delta indicated that it would consider the proposal.

4. Exhibit A contains a true and correct copy of excerpts of letter correspondence from Scott Stevens, counsel for Nokia, to Bo Davis, counsel for TQ Delta, LLC, dated April 11, 2022.

5. Exhibit B contains a true and correct copy of e-mail correspondence from Rudy Fink, counsel for TQ Delta, LLC, to Scott Stevens, counsel for Nokia, dated July 10, 2022.

6. Exhibit C contains a true and correct copy of an excerpt from the Dell'Oro reports regarding restrictions on dissemination.

Dated: July 25, 2022

Respectfully submitted,

/s/ M. Scott Stevens

M. Scott Stevens